## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

1. GREAT LAKES INSURANCES SE	)
Plaintiff,	)
vs.	) Case No: 5:22-cv-00702-JD
2. FREDY VALLE d/b/a VALLE TRUCKING,	) ) )
3. SILVER STAR CONSTRUCTION COMPANY, INC.,	) ) )
4. TYLON MACKEY,	)
5. ISRAEL JUAREZ,	)
6. ORD TRUCKING, INC., and	)
7. ZURICH AMERICAM INS. CO.,	)
Defendants.	)
8. ZURICH AMERICAN INS. CO.	)
Third-Party Plaintiff	)
9. BERKSHIRE HATHAWAY HOMESTATE INS. CO., and	) ) )
10. PROGRESSIVE NORTHERN INS. CO.	) ) )
Third-Party Defendants.	)

# THIRD-PARTY DEFENDANT PROGRESSIVE NORTHERN INSURANCE COMPANY'S WITNESS LIST

Third-Party Defendant Progressive Northern Insurance Company ("Progressive") hereby submits its Final Witness List.

No.	Name	Address/ Telephone	<b>Proposed Testimony</b>	Will be Called/May be Called
1.	Representative of Great Lakes	c/o Michael Linscott Emily Williams Doerner Saunders Daniel & Anderson 210 Park Avenue, Ste. 1200 Oklahoma City, OK 73102 (405) 319-3500	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy issued to Valle Trucking.	May be called
2.	Carly Tucker, c/o counsel for Great Lakes	c/o Michael Linscott Emily Williams Doerner Saunders Daniel & Anderson 210 Park Avenue, Ste. 1200 Oklahoma City, OK 73102 (405) 319-3500	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy issued to Valle Trucking.	May be called
3.	Fredy N. Valle Sr. d/b/a Valle Trucking	13104 Regal Vintage Rd. Oklahoma City, OK 73170 (405) 501- 8005	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy issued to him by Great Lakes.	May be called
4.	Representative of Silver Star Construction Co.	J. Chris Horton J. Chris Horton, PC P.O. Box 576 El Reno, OK 73036 (405) 317-4423	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the Hauling Agreement between it and Valle Trucking.	May be called

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5.	Representative of Zurich American Ins. Co.	c/o Amy E. Hampton Rachel C. Mathis Aston, Mathis & Campbell, PLLC 2642 East 21st Street, Suite 250 Tulsa, OK 74114	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy it issued to Fredy Valle.	May be called
6.	Representative of Progressive Northern Ins. Co.	c/o Christopher King Brad Bowlby Starr, Begin & King, PLLC 1800 S. Baltimore Ave., Ste. 550 Tulsa, OK 74119 (918) 872-03734	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy it issued to Fredy Valle.	May be called
7.	Julie Kenney	c/o counsel for Progressive Northern Ins. Co. Christopher King Brad Bowlby Starr, Begin & King, PLLC 1800 S. Baltimore Ave., Ste. 550 Tulsa, OK 74119 (918) 872-03734	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy it issued to Fredy Valle.	May be called
8.	Eric Barnes.	c/o counsel for Progressive Northern Ins. Co. Christopher King Brad Bowlby Starr, Begin & King, PLLC 1800 S. Baltimore Ave., Ste. 550 Tulsa, OK 74119 (918) 872-03734	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne), specifically the insurance policy it issued to Fredy Valle.	May be called

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9.	Tylon Mackey	c/o James Scimeca Burch, George, Germany 204 N. Robinson Ave., Ste. 1500 Oklahoma City, OK 73102 (405) 239-7711  Ryan Polchinski Andrew Polchinski Law Offices of Daniel M. Davis 300 N. Walnut Ave. Oklahoma City, OK 73104 (405) 235-4000	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne).	May be called
10.	Israel Juarez	c/o Mark Warman Levinson, Smith & Huffman 1743 E. 71st Tulsa, OK 74136	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne).	May be called
11.	ORD Trucking, Inc. c/o counsel	c/o Rodney D. Stewart Stewart Law Firm 801 N.W. 63rd St., Ste. 100 Oklahoma City, OK 73116 (405) 601-6060	Knowledge of the facts and circumstances underlying the subject lawsuit, CJ-2020-233 (Payne).	May be called
12.	Witnesses identified by	Great Lakes in response	to ZAIC's discovery requests	. May be Called.
13.	Witnesses identified by	ongoing discovery in this	s action. May be Called.	
14.	Witnesses identified by	Witnesses identified by ongoing discovery in the underlying action. May be Called.		
15.	Witnesses that have ye	t to be identified, including	g experts. May be Called.	

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16.	Witnesses listed by other parties, which are not objected to by Progressive. May be Called.
17.	Witnesses necessary for: rebuttal, impeachment, and necessary to authenticate or sponsor any exhibit. May be Called.

Respectfully submitted,

### STARR, BEGIN, & KING, PLLC

s/Bradley E. Bowlby
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Attorney for Def. Progressive Northern Ins. Co.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on September 20, 2023, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/Bradley E. Bowlby